

DENISE CARLON

ZUCKER, GOLDBERG & ACKERMAN, LLC

XFA-172348-2/gt

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P.O. Box 1024

Mountainside, NJ 07092-0024

1-908-233-8500

Attorneys for Secured Creditor

Wells Fargo Bank, NA

IN RE:

Vicente Alfredo Joseph  
Debtor

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: UNITED STATES BANKRUPTCY COURT  
: FOR THE DISTRICT OF NEW JERSEY  
: NEWARK  
:  
: CHAPTER 13  
:  
: CASE NO. 14-28562-VFP  
:  
: **NOTICE OF MOTION FOR RELIEF**  
: **FROM AUTOMATIC STAY**  
: **(RET: February 19, 2015 @ 11:00am)**  
:  
:

Vicente Alfredo Joseph  
28 Country Club Lane  
Elizabeth, NJ 07208

Walter D. Nealy, Esq.  
Attorney for Debtor(s)  
100 South Van Brunt Street  
Suite 2-C  
Englewood, NJ 07631

Marie-Ann Greenberg, Trustee  
30 Two Bridges Road, Suite 330  
Fairfield, NJ 07004

SIRS:

PLEASE TAKE NOTICE that on February 19, 2015 @ 11:00am, or soon as counsel may be heard, the undersigned, attorneys for Wells Fargo Bank, NA, will move before the United States Bankruptcy Court, 50 Walnut Street, Courtroom 3A, P.O. Box 1352, Newark, NJ 07101-1352 for an Order Vacating the Automatic Stay, with respect to the debtor's property at 28 Country Club Lane, Elizabeth, NJ 07208, and allowing Wells Fargo Bank, NA, to continue its foreclosure action, by reason of failure of the debtor to make the regular monthly mortgage payments outside of the Chapter 13 Plan, and

TAKE FURTHER NOTICE that Debtor(s) executed a promissory note secured by a mortgage or deed of trust. The promissory note is either made payable to Creditor or has been duly indorsed. Creditor, directly or through an agent, has possession of the promissory note. Creditor is the original mortgagee or beneficiary or the assignee of the mortgage or deed of trust.

TAKE FURTHER NOTICE that the facts Wells Fargo Bank, NA relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

ZUCKER, GOLDBERG & ACKERMAN, LLC  
Attorneys for Secured Creditor  
Wells Fargo Bank, NA

/s/ DENISE CARLON  
DENISE CARLON  
FOR THE FIRM

DATED: January 21, 2015

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*This is an attempt to collect a debt. Any information obtained will be used for that purpose.*

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